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9 UNITED STATES DISTRICT COURT
10 DISTRICT OF NEVADA
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12 IEHAB HAWATMEH, individually;)
13 YASMEEN HAWATMEH, individually;)
LAYTH HAWATMEH, individually; and)
14 IEHAB HAWATMEH, as Administrator of the)
ESTATE OF JOSEPH HAWATMEH,)
15 deceased,)
16)
Plaintiff,)
17 vs.)
18 CITY OF HENDERSON, et al. ,)
19 Defendants.)
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Case No. 2:22-cv-01786-APG-DJA

STIPULATION TO EXTEND TIME TO RESPOND TO
MOTION TO DISMISS (3rd Request)

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22 COMES NOW, Plaintiffs, IEHAB HAWATMEH; YASMEEN HAWATMEH; LAYTH
23 HAWATMEH; and IEHAB HAWATMEH, as Administrator of the ESTATE OF JOSEPH
24 HAWATMEH, and Defendants, CITY OF HENDERSON; CITY OF HENDERSON POLICE
25 DEPARTMENT; THEDRICK ANDRES; LIEUTENANT THOMAS CHIELLO; SERGEANT
26 JAIME SMITH fka SERGEANT JAIME CLEAR; SERGEANT SETH VAN BEVEREN;
27 OFFICER BRETT ANDERSON; OFFICER JESSE HEHN; OFFICER JESSE LUJAN;
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1 OFFICER JAMES PENDLETON; OFFICER LUIS AMEZCUA; OFFICER PHILIP DUFFY;
2 OFFICER SETH PRICE, by and through their undersigned counsel, and hereby stipulate and
3 agree as follows:

- 4 1. The Defendants hereto filed a Motion for Dismissal Pursuant to FRCP 12(b)(6) on
5 December 13, 2022 [ECF #25]. A response to said Motion is presently due on or
6 about March 20, 2023.
- 7 2. Although substantial discovery has not yet taken place in this matter, Plaintiffs
8 have obtained thousands of pages of documents and a large number of audio and
9 video files which are relevant to the claims and defenses herein. Plaintiffs'
10 counsel continues to require additional time to review this evidence prior to
11 responding to Defendants' Motion to Dismiss. In addition, Plaintiff's counsel
12 has had and continues to have other work and family obligations that have
13 reduced the time available to respond to both of the subject motions.
- 14 3. Moreover, Plaintiff's counsel has been required to respond to Defendants' Motion
15 to Stay Discovery filed on February 14, 2023 [ECF #30].
- 16 4. Plaintiff's counsel has requested and shall be granted an additional extension of
17 time in which to respond to Defendants' Motion to Dismiss until March 27, 2023.

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5. This Stipulation is made in good faith and not for purpose of delay.

Dated this 15th day of March, 2023.

ROGER P. CROTEAU &
ASSOCIATES, LTD.

MARQUIS & AURBACH

/s/ Timothy E. Rhoda
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IT IS SO ORDERED.

By: 
Judge, U.S. District Court

Dated: March 16, 2023